

Exhibit C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to all cases.

MASTER DOCKET

18-md-2865 (LAK)

**PLAINTIFF SKAT'S REQUESTS FOR PRODUCTION
OF DOCUMENTS REGARDING RELATED ENTITIES**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Civil Rule 26.3 of the Local Rules of this Court, Plaintiff Skatteforvaltningen ("SKAT") propounds to Defendants in the above-captioned action listed in Schedule A these Requests for Production of Documents (the "Requests" and each a "Request"). The Defendants are to respond to the Requests fully and in accordance with the definitions and instructions set forth below on or before April 2, 2021, and produce the documents identified in response to the Requests at the office of

Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, New York 10004
Attn: Marc A. Weinstein (marc.weinstein@hugheshubbard.com) and
John T. McGoey (john.mcgoey@hugheshubbard.com)

INSTRUCTIONS

1. Whenever necessary to bring within the scope of the Requests documents that might otherwise be construed to be outside their scope:

(a) the use of a verb in any tense shall be construed as the use of that verb in all other tenses;

(b) the use of a word in its singular form shall be deemed to include within its use the plural form as well;

(c) the use of a word in its plural form shall be deemed to include within its use the singular form as well;

(d) the connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope; and

(e) the terms “all,” “any,” and “each” shall be construed as encompassing any and all.

2. Each paragraph of the Requests should be construed independently and no other paragraph shall be referred to or relied on for the purpose of limiting the scope of any Request.

3. Documents and things should be produced in full, without abbreviation or expurgation, regardless of whether You consider the entire document to be relevant or responsive.

4. A request for a document shall be deemed to include a request for all actual, proposed, or contemplated drafts or mark-ups thereof, revisions, modifications, or amendments thereto, and non-identical copies thereof, in addition to the document itself.

5. Documents and things not otherwise responsive to any of the Requests herein should be produced if such documents and things mention, discuss, refer to, or explain one or more documents and things called for by the Requests or are attached to a document or thing called for by the Requests.

6. Documents and things should be produced pursuant to Rule 34 of the Federal Rules of Civil Procedure as they are kept in the usual course of business or organized and labeled to correspond to the categories identified in these requests.

7. With respect to any document or thing responsive to the Requests that is withheld from production based on a claim of privilege, or for any other reason, describe such document by date, type (e.g., letter, memorandum, email, note), author, addressee, persons copied, general

subject matter, claimed ground for the withholding, and, if not apparent, the relationship of the author, addressee, and recipients to each other.

8. In the event that any requested document or thing is known to have existed and cannot now be located or has been destroyed or discarded, that document shall be identified by: the last known custodian, date of destruction or discard, the manner of destruction or discard, the reasons for destruction or discard, any efforts made to locate such documents, and a statement describing the document by contents, author, and recipients.

9. If You are unable fully to respond to any of the Requests, supply the information that is available and explain why Your response is incomplete, the efforts made by You to obtain responsive documents and things, and the source from which all responsive documents and things may be obtained, to the best of Your knowledge or belief.

10. Unless otherwise specified, the documents and things requested include the responsive documents and things in the actual or constructive possession, control, or custody of You or Your attorneys or agents.

11. The fact that a document has been or will be produced by another party (or non-party) does not relieve You of the obligation to produce Your copy of the same document, even if the two documents are identical in all respects.

12. Please provide documents as single-page black and white TIFFs, with document-level OCR, delimited (.DAT) document load file, LFP or OPT image load files, and metadata for the following fields: BegDoc, EndDoc, BegAttach, EndAttach, Subject, FileName, Sent Date, Created Date, Last Modified Date, Author, From, To, CC, BCC, Recipients, Custodian, FilePath, Parent, MD5, ConfidentialStamp, Text_Path, and File_Path.

13. Please provide separate copies of spreadsheets (Excel), presentations (PowerPoint) and database files in their native format. The produced file should be named with the Bates number of the first page of the corresponding TIFF production of the document (e.g., “ABC0000001.xls”).

14. These Requests are continuing and oblige You, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, to promptly produce additional documents or things that are acquired, discovered or come into existence at any time after the date of the initial production, including the time of hearing or trial.

REQUESTS FOR PRODUCTION

Request for Production No. 1:

Bank account statements for any entity listed in Schedule B, for the period January 1, 2012 through the present.

Request for Production No. 2:

All documents related to the opening or closing of any bank account for any entity listed in Schedule B.

Request for Production No. 3:

All documents reflecting the conduct of any business, or provision of any services, by any entity listed in Schedule B, including but not limited to invoices or other requests or demands for payment for such business or services.

Request for Production No. 4:

All communications related to Requests Nos. 1 through 3.

Dated: New York, New York
March 3, 2021

HUGHES HUBBARD & REED LLP

By: /s/ John T. McGoey
William R. Maguire
Marc A. Weinstein
Neil J. Oxford
John T. McGoey

One Battery Park Plaza
New York, New York 10004-1482
Telephone: (212) 837-6000
Fax: (212) 422-4726
bill.maguire@hugheshubbard.com
marc.weinstein@hugheshubbard.com
neil.oxford@hugheshubbard.com
john.mcgoey@hugheshubbard.com

Counsel for Plaintiff Skatteforvaltningen

Schedule A

David Zelman
Edwin Miller
Joseph Herman
Perry Lerner
Robin Jones
Ronald Altbach
Albedo Management LLC Roth 401(K) Plan
Ballast Ventures LLC Roth 401(K) Plan
Bareroot Capital Investments LLC Roth 401(K) Plan
Battu Holdings LLC Roth 401K Plan
Cantata Industries LLC Roth 401(K) Plan
Cedar Hill Capital Investments LLC Roth 401(K) Plan
Crucible Ventures LLC Roth 401(K) Plan
Dicot Technologies LLC Roth 401(K) Plan
Eclouge Industry LLC Roth 401(K) Plan
Fairlie Investments LLC Roth 401(K) Plan
First Ascent Worldwide LLC Roth 401(K) Plan
Fulcrum Productions LLC Roth 401(K) Plan
Green Scale Management LLC Roth 401(K) Plan
Keystone Technologies LLC Roth 401(K) Plan
Limelight Global Productions LLC Roth 401(K) Plan
Loggerhead Services LLC Roth 401(K) Plan
Monomer Industries LLC Roth 401(K) Plan
PAB Facilities Global LLC Roth 401(K) Plan
Pinax Holdings LLC Roth 401(K) Plan
Plumrose Industries LLC Roth 401K Plan
Roadcraft Technologies LLC Roth 401(K) Plan
Sternway Logistics LLC Roth 401(K) Plan
Trailing Edge Productions LLC Roth 401(K) Plan
True Wind Investments LLC Roth 401(K) Plan
Tumba Systems LLC Roth 401(K) Plan
Vanderlee Technologies Pension Plan
Vanderlee Technologies Pension Plan Trust

Schedule B

Albedo Management LLC
Ballast Ventures LLC
Bareroot Capital Investments LLC
Battu Holdings LLC
Cantata Industries LLC
Cedar Hill Capital Investments LLC
Crucible Ventures LLC
Dicot Technologies LLC
Eclouge Industry LLC
Fairlie Investments LLC
First Ascent Worldwide LLC
Fulcrum Productions LLC
Green Scale Management LLC
Keystone Technologies LLC
Limelight Global Productions LLC
Loggerhead Services LLC
Monomer Industries LLC
PAB Facilities Global LLC
Pinax Holdings LLC
Plumrose Industries LLC
Roadcraft Technologies LLC
Sternway Logistics LLC
Trailing Edge Productions LLC
True Wind Investments LLC
Tumba Systems LLC
Vanderlee Technologies LLC